

EXHIBIT F

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SUSAN B. LONG, et al.,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendant.

Civ. A. No. 17-1097 (APM)

**DECLARATION OF MARLA JONES
IN SUPPORT OF THE UNITED STATES DEPARTMENT OF HOMELAND
SECURITY'S MOTION FOR SUMMARY JUDGMENT**

I. INTRODUCTION

I, Marla Jones, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Unit Chief of the Statistical Tracking Unit ("STU") within Enforcement and Removal Operations ("ERO") Law Enforcement and Systems Analysis ("LESA") at U.S. Immigration and Customs Enforcement ("ICE"). I have held this position since January 2016. I previously served as the Acting Chief of STU from July 2015 until accepting the position, and prior to that, served as Detention and Deportation Officer subject matter expert within STU since June 2013. I have served as an officer for ERO since January 2008. The LESA STU mailing address is 500 12th Street, S.W., STOP 5009, Washington, D.C. 20536-5009.

2. The LESA STU is responsible for providing all official ERO reporting to Congress, the White House, and other internal and external stakeholders, in addition to the public through the FOIA.

3. As the Unit Chief for the STU, my official duties and responsibilities include the general management, oversight, and supervision of a staff of Statisticians, Detention and Deportation Officers (Subject Matter Experts), Program Analyst, and Mission Support staff. The STU is responsible for

providing operational reports and strategic analysis to stakeholders and senior leadership on behalf of ERO.

4. I make this declaration in support of ICE's Motion for Summary Judgment in the above-captioned action. The statements contained in this declaration are based upon my personal knowledge, my review of documents kept by ICE in the ordinary course of business, and information provided to me by other ICE employees in the course of my official duties.

5. In my role as the Unit Chief for the STU, I am familiar with the following FOIA requests submitted by Susan Long and David Burnham on behalf of the Transactional Records Access Clearinghouse ("TRAC") to ICE:

- a. FOIA request 2016-ICFO-14043, dated January 4, 2016, asking for "the latest anonymous case-by-case information on each removal and return for FY 2015 through December 2015 that was the result of such IDENT/IAFIS interoperability matches whether carried out under Secure Communities or under the program that is replacing Secure Communities."
- b. FOIA request 2016-ICFO-54702, dated August 31, 2016, asking for "the latest anonymous case-by-case information on each removal and return for FY 2015 through August 2016 that was the result of such IDENT/IAFIS interoperability matches whether carried out under Secure Communities or under the program that is replacing Secure Communities."

II. DESCRIPTION OF THE EID/IIDS DATA REPOSITORIES

6. The Enforcement Integrated Database ("EID") is owned and operated by ICE and is used primarily to support the law enforcement activities of certain Department of Homeland Security ("DHS") components, including ICE and U.S. Customs and Border Protection ("CBP"). The EID is the

common database repository for all records created, updated, and accessed by a number of software applications. The EID allows ICE officers to manage cases from the time of an alien's arrest, in-processing, or placement into removal proceedings, through the final case disposition (*i.e.*, removal or granting of immigration benefits). It also contains law enforcement sensitive information relating to investigations, enforcement operations, and checks of other law enforcement databases. The EID is a 24x7 operational database with more than 55,000 users. The EID houses data and business rules that are integrated with other systems through direct database connectivity or complex interfaces.

7. The EID captures and maintains information related to the investigation, arrest, booking, detention, and removal of persons encountered during immigration and law enforcement investigations and operations conducted by ICE and CBP. The EID provides users with the capability to access a person-centric and/or event-centric view of the data. Users can also print records containing the EID data, which are used for criminal and administrative law enforcement purposes and typically are retained in criminal investigative files, detention files, and Alien Files ("A-Files").

8. As ICE's operational database, the EID is used to store data captured 24 hours a day, by ICE and CBP law enforcement personnel who input or update law enforcement sensitive information about individuals that have been encountered or arrested by ICE or CBP law enforcement components. The data includes information about individuals that will be turned over to ICE, those currently in custody, those that have been released, and those that are targeted for future enforcement actions. The EID is used as data storage throughout the immigration enforcement lifecycle from arrest to removal or release.

9. For the two FOIA requests that are the subject of this litigation, ICE conducted searches utilizing the ICE Integrated Decision Support System ("IIDS"). The IIDS contains a subset of data from